



October 17, 2018

US MAIL

Lanxess Corporation  
2151 King Street Ext  
Charleston, SC 29405-6124  
Attn: Mr. Larry Kowal

Re: **NOTICE OF VIOLATION-** U.S. EPA Regulations at 40 CFR, Part 63 and 5 S.C. Code Ann. Regs. 61-62.63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, and 5 S.C. Code Ann. Regs. 61-62.1 (Supp. 2017), Section II, *Permit Requirements*

Dear Mr. Kowal:

Lanxess Corporation (“Lanxess”) produces a variety of specialty chemical products in multiple manufacturing units at its facility located at 2151 King Street Ext in Charleston, South Carolina.

The Department issued Part 70 (Title V) Air Quality Permit TV-0560-0011 (“Title V Permit”) to Lanxess, effective July 1, 2008. The Title V Permit expired on June 30, 2013; however, Lanxess submitted a timely Title V renewal application. The Title V Permit authorizes Lanxess to maintain a 125kW emergency generator, a 175kW emergency generator, and a fire pump at the facility.

U.S. EPA Regulations at 40 CFR, Part 63, *National Emission Standards for Hazardous Air Pollutants for Source Categories*, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and 5 S.C. Code Ann. Regs. 61-62.63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (collectively, “Subpart ZZZZ”), require periodic maintenance activities to be conducted on the generators and fire pump.

The Title V Permit and Subpart ZZZZ require Lanxess to change the oil and filter every 500 hours of operation or annually, whichever comes first.

On June 26, 2018, the Department conducted a comprehensive inspection at Lanxess. During the inspection, the Department inspector observed and documented that Lanxess had not changed the oil and filters in the generators and the fire pump since January 2017.

On June 30, 2018, Cummins Atlantic changed the oil and filter on the two generators and the fire pump. The Department received a copy of the invoice indicating the maintenance activities had been performed.

Based on the above findings, and the requirements set forth in the Title V Permit and Subpart ZZZZ, Lanxess is hereby issued this Notice of Violation of U.S. EPA Regulations at 40 CFR,

Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 5 S.C. Code Ann. Regs. 61-62.63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, and 5 S.C. Code Ann. Regs. (Supp. 2017), Section II, *Permit Requirements* in that it failed to change the oil and filter on the two emergency generators and fire pump every 500 hours or annually, whichever came first.

Please be advised that any future observed violations may result in the Department taking further enforcement action, including the assessment of civil penalties. If you have any questions regarding this matter, please contact me by telephone (803) 898-4823 or email at [ringblka@dhec.sc.gov](mailto:ringblka@dhec.sc.gov).

Sincerely,



Katy Ringbloom  
Environmental Health Manager  
Bureau of Air Quality Enforcement Section  
S.C. Dept. of Health & Environmental Control

(00-9276)

cc: Compliance File 0560-0011  
cc: H. Stillwell, Lowcountry Region, BEHS (Charleston)  
J. Robinson, B. Decker, K. Frost, BAQ